

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

IN THE MATTER OF:)
Number Resource Optimization) CC Docket No. 99-200
)
)

PETITION OF THE MINNESOTA PUBLIC UTILITIES COMMISSION TO SUBSTITUTE
AN ALTERNATIVE NPA FOR THE NPA LISTED ON THE ROLLOUT SCHEDULE

Minnesota Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, Minnesota 55101

November 6, 2001

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The Minnesota Public Utilities Commission (MNPUC) makes this filing in response to the Federal Communications Commission's (FCC) Common Carrier Bureau's request for comment on the proposed national thousands-block number pooling rollout schedule (rollout schedule) published in the October 17, 2001 Public Notice (Notice). The Notice invited interested parties to comment on the structure of the proposed national thousands-block number pooling rollout schedule, including the dates for implementing thousand-block pooling for specific numbering plan areas NPAs. In addition, the Notice suggested that requests from states to opt into or out of the rollout schedule , or substitute an alternative NPA, should be filed in response to the Notice

Since 1996, the MNPUC has relieved the 612 (NPA) on three separate occasions. On two of the occasions, a two-way geographic split was

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utilized.¹ In the third and most recent occasion, a three-way geographic split was the MNPUC's preferred method of area code relief.² Having experienced three separate area code relief proceedings in a relatively short period of time, the MNPUC would rather not undertake a fourth relief effort anytime soon.³ The MNPUC recognizes first hand that the North American Numbering Plan (NANP) is in jeopardy of near-term exhaust unless immediate and effective conservation efforts are undertaken at both the state and federal levels. It is the MNPUC's opinion that with the extended relief period resulting from its most recent three-way geographic split and an effective number pooling effort, the lives of Minnesota's metropolitan NPAs can be extended well beyond their current exhaust projection dates.

¹ See MNPUC Orders dated November 3, 1995 Order After Reconsideration Docket No. P-999/M-95-357 and November 13, 1997 Order Establishing Area Code Relief Plan, Setting Policies For Number Conservation, And Establishing Task Force, Docket No. P-999/M-97-506.

² See MNPUC Orders dated April 6, 1999 Order After Reconsideration and June 4, 1999 Order Confirming April 6, 1999 Decision, With Modifications and Further Clarifications, Docket No. P-999/M-97-506.

³ This is precisely why the MNPUC undertook a three-way geographic split as its latest relief effort. The 763 NPA is projected to exhaust in the fourth quarter of 2015. The 952 NPA is projected to exhaust in the first quarter of 2013, and the 612 NPA is projected to exhaust in the fourth quarter of 2008. These exhaust projections do not include the effects of implementing any number resource optimization measures.

Petition of the Minnesota Public Utilities Commission

The Minnesota Public Utilities Commission respectfully requests that the FCC make the following modifications to the planned number pooling rollout for Minnesota's seven NPAs:

Current FCC NPA Number Pooling Rollout Schedule	Requested MPUC NPA Number Pooling Rollout Schedule
320 Pooling Rollout Quarter 1	507 Pooling Rollout Quarter 1
763 Pooling Rollout Quarter 2	612 Pooling Rollout Quarter 2
952 Pooling Rollout Quarter 2	218 Pooling Rollout Quarter 2
651 Pooling Rollout Quarter 3	651 Pooling Rollout Quarter 3
612 Pooling Rollout Quarter 4	952 Pooling Rollout Quarter 4
218 Pooling Rollout Quarter 6	763 Pooling Rollout Quarter 6
507 Pooling Rollout Quarter 7	320 Pooling Rollout Quarter 7

The MNPUC believes that its proposed schedule better reflects the order in which the seven Minnesota NPAs will exhaust. However, the MNPUC is aware that the FCC and the number pooling administrator (Pooling Administrator) considered other factors such as the number of carriers capable of pooling in an NPA and the number of

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available thousands-blocks. The MNPUC supports the FCC's efforts to use thousands-block pooling to maximize the life of all NPAs.

The MNPUC believes in certain circumstances that number pooling can be used to extend the lives of NPAs which may be approaching exhaust within a few years.

In Minnesota, the current estimate of exhaust for the 507 NPA is the third quarter of 2006. This is the last NPA scheduled for number pooling in Minnesota under the proposed rollout plan, but it is the Minnesota NPA most likely to exhaust first. Conversely, the 320 NPA, the first NPA in the state scheduled for pooling, has the greatest number of years to exhaust of the Minnesota NPAs (3rd Quarter of 2024).

The MNPUC believes that the current schedule with the 320 NPA as the first Minnesota NPA to be pooled is somewhat of an anomaly. The 320 NPA is largely rural and was created as a result of the first geographic split of the 612 NPA in 1996. The dominant MSA in this NPA is St. Cloud, Minnesota. As of 1997, the St. Cloud MSA ranked 185th in population nationally. The 320 NPA gets classified into the Minneapolis/St. Paul MSA as a result of one county from the Minneapolis/St. Paul MSA which partially resides in the 320 NPA. In effect, the 320 NPA should be classified as being in the St. Cloud MSA. It possesses none of the attributes associated with

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being in the Minneapolis/St. Paul MSA.

With respect to the remaining Minnesota NPAs, the MNPUC believes that moving the NPAs with the fewest years to exhaust to the earlier number pooling implementation slots would extend the lives of those NPAs many years beyond the current projections without significantly compromising the lives of those NPAs with longer expected lives.

By such action, the MNPUC hopes to forestall the need for NPA relief in Minnesota any time soon. The MNPUC files this petition based on the best information available to it. Based on this information, it appears that the MNPUC's request is reasonable and consistent with the most efficient use of the North American Numbering Plan and should be granted. As such, the MNPUC respectfully requests that the FCC grant its request in whole or in part.

CONCLUSION

For the reasons stated above, the MNPUC respectfully requests that the FCC grant its petition in whole or in part.

Respectfully submitted,

Gregory Scott,

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Chairman

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